

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**E - LINK PLASTIC & METAL
INDUSTRIAL CO., LTD.**

Plaintiff,

v.

**THE ENTITIES AND INDIVIDUALS
IDENTIFIED IN ANNEX A**

Defendants.

Civil Action No.: 1:23-cv-16802

Honorable Judge Sunil R. Harjani

Magistrate Judge Heather K. McShain

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF’S *EX PARTE* MOTION TO
EXTEND THE TEMPORARY RESTRAINING ORDER**

Plaintiff, E - LINK PLASTIC & METAL INDUSTRIAL CO., LTD. (“Plaintiff”), respectfully requests that this Court enter an order extending the Sealed Temporary Restraining Order (Dkt. No. 26) entered in this matter for a period of fourteen days, through and including May 23, 2024. In support, Plaintiff states as follows:

Federal Rule of Civil Procedure 65(b)(2) states that an *ex parte* temporary restraining order “expires at the time after entry—not to exceed 14 days—that the court sets, unless before that time the court, for good cause, extends it for a like period” and that the “reasons for an extension must be entered into the record.” Fed. R. Civ. P. 65(b)(3). Plaintiff believes that sufficient good cause exists to extend the Sealed Temporary Restraining for an additional fourteen days.

As is shown in Plaintiff’s *Ex Parte* Motion for Entry of a Temporary Restraining Order and Memorandum of Law in Support (Dkt. Nos. 23-24), in the absence of a restraining order,

and more specifically the asset freeze, it is highly likely that Defendants will simply move their ill-gotten funds to accounts and locations outside the reach of the powers of this Court and will continue to unlawfully offer infringing versions of Plaintiff's goods. Since the entry of the Sealed Temporary Restraining Order, Plaintiff and Plaintiff's counsel have worked diligently to comply with the terms of the order. *See* Declaration of Ge (Linda) Lei. Plaintiff has been in contact with the third parties who have provided the means by which the Defendants accomplished their unlawful activities. *Id.* The third parties have begun the process of identifying the individuals behind those online accounts named in Plaintiff's Second Amended Complaint (Dkt. No. 16) and have begun freezing their assets. *Id.* However, the third parties and Plaintiff require more time to comply with the terms of the Sealed Temporary Restraining Order. *Id.* Without such an extension, Defendants, like before, can simply evade this Court and Plaintiff.

In light of this, Plaintiff respectfully requests that this Court extend the Sealed Temporary Restraining Order for an additional fourteen days, through and including May 23, 2024.

DATED May 1, 2024

Respectfully submitted,

/s/ Ge (Linda) Lei
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